

Capital Region Water, Harrisburg Pennsylvania Chronology

December 2013 - City has transferred systems to Capital Region Water (CRW) per EPA and Pennsylvania's Receiver's recommendations

February 10, 2015 - Partial Consent Decree (PCD) lodged in Federal Court

May 8, 2015 - CSO Activation Monitoring Pilot (CAMP) Study Plan submitted & approved

July 29, 2015 - Long-Term Rainfall /Typical Year Analysis submitted and approved

August 24, 2015 - PCD entered into federal court

February 10, 2016 - Separate Sanitary Sewer Capacity Assessment Plan submitted and approved

February 10, 2016 - CSO Outfall Structure Repair and Schedule submitted and agreed to be address in Long Term Control Plan (LTCP)

April 1, 2016 - Sewer System H/H Model Report submitted. It required two EPA comment letters before it was approved

April 1, 2016 - Sensitive Areas / Priority Areas submitted, EPA commented on September 21, 2016 and required to be addressed in LTCP

April 1, 2016 - Financial Capability Analysis (FCA) submitted, EPA disapproved. EPA requested additional information and developing its own FCA

April 29, 2016 – CRW completes biological nutrient removal upgrades at a cost of \$57 million

December 1, 2016 - CAMP Study Report submitted and reviewed by EPA

April 1, 2017 - Existing System Characterization for CSO submitted. EPA requested additional information and approved July 25, 2017

April 1, 2017 - Capacity Assessment Report with repair schedule for separate sanitary submitted. EPA requested additional information several times and was approved December 17, 2017

February 10, 2018 - Sinkhole Remediation Report submitted. The remaining sinkholes will be addressed when CRW repairs Paxton Interceptor

April 1, 2018 – LTCP submitted

July 6, 2018 – EPA disapproved LTCP with comments. Comments focused on meeting PCD requirements.

August 31, 2018 – As referenced in the July 6, 2018 letter, CRW provided partial in response to EPA's comments on the LTCP

October 12, 2018 – EPA sends letter reiterating that FCA deficiencies are outstanding and noting potential liability for stipulated penalties.

November 1, 2018¹—EPA call with CRW to discuss missing elements of FCA: 1) including all costs to bring CRW into compliance with CWA; 2) including households and MHI for entire service area, not just Harrisburg; 3) correct calculation of residential share of total WWT and CSO costs. EPA also requested additional documentation to support the CRW's FCA assumptions.

November 9, 2018 – CRW provided some comments to EPA in reference to July 6, 2018 letter, but did adequately respond to EPA's comments

December 21, 2018 – CRW submits FCA documentation as requested by EPA on November 1, 2018.

March 22, 2019 – CRW resubmits its FCA, updated per EPA's November 1, 2018 request.

July 18, 2019 – EPA reiterated its concerns with the LTCP and its disapproval in a letter.

¹ Email was sent on November 7, 2018 documenting these requests.